

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ASHLEY T. ADAMS,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 05-249-KAJ
)	
INTEGRITY STAFFING, et al.,)	
)	
Defendants.)	

**DEFENDANTS INTEGRITY STAFFING SOLUTIONS AND J.P. MORGAN
CHASE BANK'S ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF'S
COMPLAINT AND AMENDED COMPLAINT**

Defendants Integrity Staffing Solutions (incorrectly identified as “Integrity Staffing”) (“Integrity”) and J.P. Morgan Chase Bank (incorrectly identified as “JP Morgan Chase Bank One”) (“JPMC”), by and through their undersigned attorneys, hereby respond to the Complaint and Amended Complaint of plaintiff Ashley T. Adams as follows:

A. Answer to Plaintiff's Complaint

1. The allegations in paragraph 1 of the Complaint state conclusions of law to which no response is required, and the same are therefore denied.
2. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 2 of the Complaint, and same are therefore denied.
3. Integrity denies that it has a place of business at 220 Continental Drive, Suite 102, Newark, Delaware, 19713-2107 as its office has relocated to 750 S. Madison Street, Suite 300, Wilmington, Delaware, 19801. Integrity denies that it is “also known as: Pepper Hamilton LLP” as Pepper Hamilton is counsel for defendant. JPMC admits that it has an office at 500 Stanton Christiana Road, Newark, New Castle County, Delaware 19713-2107.

Defendants are without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in paragraph 3 of the Complaint, and same are therefore denied.

4. Defendants admit that Integrity staffed plaintiff on two temporary assignments at JPMC. The remaining allegations in paragraph 4 of the Complaint are denied.

5. The allegations in paragraph 5 of the Complaint are denied.

6. The allegations in paragraph 6 of the Complaint state conclusions of law to which no response is required, and the same are therefore denied.

7. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 7 of the Complaint, and same are therefore denied.

8. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 8 of the Complaint, and same are therefore denied.

9. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 9 of the Complaint, and same are therefore denied.

10. Defendants deny the allegations in paragraph 10 of the Complaint.

11. Paragraph 11 was omitted from plaintiff's Complaint.

12. Defendants admit only that the Charges of Discrimination (the "Charges") purportedly filed by Plaintiff with the Equal Employment Opportunity Commission are attached to plaintiff's Complaint. Defendant denies the facts as set forth in the Charges.

13. Defendants deny the allegations in paragraph 13 of the Complaint.

14. Defendants deny the allegations in paragraph 14 of the Complaint.

B. Answer to Amended Complaint to Assert Claim under 42 U.S.C. § 1981

1. Defendants Cheryl Denny ("Denny") and Dawn Harper-Smith ("Harper-Smith") deny the allegations in paragraph 1 of the Amended Complaint.

2. Denny and Harper-Smith deny the allegations in paragraph 2 of the Amended Complaint.

3. Harper-Smith admits only that sometime after Adams was initially placed by Integrity at JPMC she offered Adams another position at JPMC which Adams accepted. The remaining allegations in paragraph 3 of the Amended Complaint are denied.

First Affirmative Defense

Defendants did not engage in any unlawful employment practices with respect to Plaintiff.

Second Affirmative Defense

Defendants' decisions with respect to plaintiff were made for legitimate, non-discriminatory reasons unrelated to her gender, race, color or national origin.

Third Affirmative Defense

Plaintiff was treated at all times in a legitimate non-discriminatory manner.

Fourth Affirmative Defense

The Complaint fails to state a claim upon which relief can be granted.

Fifth Affirmative Defense

Plaintiff's claims fail in whole or in part because Plaintiff cannot establish elements necessary to her claims.

Sixth Affirmative Defense

Plaintiff is not entitled to some or all of the relief sought.

Seventh Affirmative Defense

Plaintiff has failed to mitigate some or all of her alleged damages.

Eighth Affirmative Defense

Defendants took prompt and adequate remedial action reasonably calculated to prevent any harassment.

Ninth Affirmative Defense

Plaintiff unreasonably failed to take advantage of any preventative or corrective opportunities provided by defendants or to avoid harm otherwise.

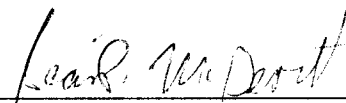
Reservation of Rights

Defendants reserve the right to add one or more of the affirmative defenses listed in Federal Rule of Civil Procedure 8(c) and 12(b) if facts are discovered to support an additional affirmative defense.

WHEREFORE, defendants pray that plaintiff's claim for relief be denied, that the Complaint and Amended Complaint be dismissed in their entirety, and that judgment be entered in defendants' favor, together with costs and reasonable attorney's fees incurred herein, and any other relief as the Court deems just and proper.

Dated: March ²²__, 2006

Respectfully submitted,



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Attorneys for Defendants

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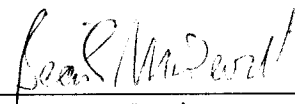
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CERTIFICATE OF SERVICE

I hereby certify that I caused two copies of the foregoing Answer and Affirmative Defenses to Amended Complaint to be served upon the following on the date set forth below, via first-class mail, postage prepaid:

Ashley T. Adams
716 North Barrett Lane
Christiana, DE 19702
Plaintiff

Dated: March ²⁰__, 2006



Sean P. McDevitt